

Attention: James Windebar

27 February 2017

Dear Sir,

REF: CPS 7431/1

CLEARING APPLICATION, TOODYAY ROAD (Main Roads WA)

The [REDACTED] would like to thank the Department of Environment Regulation for the opportunity to comment on the above clearing application. We make two recommendations (see below).

The TNC acknowledges that Toodyay Road is a dangerous carriageway that has been neglected by authorities for many years. Thus improvements are vital and timely action is necessary.

The TNC acknowledges that the proposal has been re-aligned to protect the Morangup Nature Reserve (the TNC led a successful campaign in the 1980s to have this reserve established); an historic well (Beelaring spring) exists within this reserve and close to the carriageway. However:

- the Roadside vegetation is a part of a Threatened Ecological Community (the *Critically Endangered Woodlands of the Wheatbelt*), providing habitat for Priority plant species; and
- the Roadside vegetation provides habitat for Threatened and Vulnerable fauna such as *black cockatoos (both red and white tailed) and chuditch*.

To be fair to these communities offsets should be considered. These offsets could involve the purchase of similar types of vegetation to be absorbed into the National Estate. It is not too late for such offsets to be made.

**Recommendation 1:** That to offset the clearing of up to 10ha of a *Threatened Ecological Community* the State Government purchase an appropriate area of the *Critically Endangered Woodlands of the Wheatbelt* to be set aside for conservation and absorbed into the National Estate.

The TNC has been recognised as a leader in roadside conservation activities; in adopting the TNC's Draft Policy on Roadside Conservation in May 1976, the Toodyay Shire was possibly the first local government in Western Australia (and Australia) to have a roadside conservation policy.

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The TNC has a long standing record of working with agencies in a conciliatory manner on issues relating to the environment. We would have been only too willing to work with Main Roads WA to ensure that local knowledge on local issues was considered during the survey stage of this important project.

**Recommendation 2:** That Main Roads WA work collaboratively with groups such as the TNC at the survey stage to ensure that local environmental knowledge is utilised, in addition to providing opportunities to comment on plans that have already been fully developed.

Thank you again for the opportunity to comment.

Yours faithfully,



atbelt North